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By:                     

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

SOVEREIGN INDIGENOUS HOLDINGS,

c/o Dwayne Anthony Yeargin, Trustee

P.O. Box 3431

Capitol Heights, Maryland 20791

USDC - GREENBELT  
'25 JUN 9 AM 10:42

Plaintiff,

v.

Civil Action No:

RALPH POWERS, ESQ.,

POWERS & WORSHTIL, P.C.

545 Water Street

Upper Marlboro, MD 20772

ORPHANS' COURT FOR PRINCE GEORGE'S COUNTY

14735 Main Street

Upper Marlboro, MD 20772

NICOLE GENEVA ABRAMS (Former DPOA),

6912 Halleck St,

District Heights, MD 20747

PRINCE GEORGE'S COUNTY LAND AND RECORDS

Judicial Administrative Services

14701 Gov. Oden Bowie Drive,

Upper Marlboro, MD 20772

JUDGE JASON DELOACH

14735 Main Street

Upper Marlboro, MD 20772

Defendants.

**VERIFIED COMPLAINT  
FOR INJUNCTIVE RELIEF, DAMAGES & RESTITUTION**

NOW COMES Plaintiff, SOVEREIGN INDIGENOUS HOLDINGS, a Private Trust represented by its Trustee, Dwayne Anthony Yeargin, appearing Pro Se, who brings this civil complaint under federal and Maryland state law, and respectfully alleges as follows:

**I. JURISDICTION AND VENUE**

1. This Court has jurisdiction under 28 U.S.C. § 1331 (Federal Question), 28 U.S.C. § 1343 (Civil Rights Violations), and 28 U.S.C. § 1367 (Supplemental Jurisdiction) as Plaintiff alleges violations of:

42 U.S.C. § 1983 (Color of Law)  
5th & 14th Amendments to the U.S. Constitution (Due Process)  
18 U.S.C. § 1961 et seq. (RICO)  
15 U.S.C. § 78j(b) (Securities Fraud)  
26 U.S.C. § 7201 (Tax Evasion)  
Md. Code, Crim. Law § 8-301 (Fraud)  
§ 7-104 (Embezzlement)  
§ 14-302 (Elder Abuse)  
Md. Real Prop. Code § 3-104 (Unlawful Deed Transfer)  
Md. Estates & Trusts § 13-101, § 13-201 (Fiduciary Abuse)  
UCC Article 9 (Secured Transactions)

2. Venue is proper in this district under 28 U.S.C. § 1391 because all relevant events and parties are situated in Prince George's County, Maryland.

## **II. MAXIMS OF LAW (LATIN)**

3. "Fraus omnia vitiat" — Fraud vitiates everything.
4. "Ex dolo malo non oritur actio" — No action arises from deceit.
5. "Ignorantia juris non excusat" — Ignorance of the law excuses not.
6. "Actus legis nemini facit injuriam" — The act of the law does injury to no one.

### III. THE PARTIES

7. Plaintiff SOVEREIGN INDIGENOUS HOLDINGS is a private trust organized under common law, with principal Trustee Dwayne Anthony Yeargin.

8. Defendant NICOLE GENEVA ABRAMS was the Durable Power of Attorney (DPOA) for the late Bennie Yeargin and violated her fiduciary duties through unauthorized self-dealing and transfer of real and personal property.

9. Defendant RALPH POWERS is an attorney who was retained by Nicole Abrams to conceal misconduct and later appointed as personal representative over Plaintiff's objections.

10. Defendant ORPHANS' COURT facilitated and ratified multiple due process violations and failed to provide impartial hearings.

11. Defendant PRINCE GEORGE'S COUNTY LAND AND RECORDS improperly recorded unauthorized property transfers without verifying supporting documentation.

12. Defendant JUDGE JASON DELOACH acted under color of law to improperly influence proceedings, violate due process, and enable conflict of interest.

### IV. STATEMENT OF FACTS

13. Nicole Abrams, acting as DPOA for Bennie Yeargin, unlawfully transferred the real property located at 502 Peacock Dr., Hyattsville, MD 20785 into her own name and seized two motor vehicles:

\* 2008 Hyundai Santa Fe, VIN: 5NMSG13DX8H185811

\* 2011 Chevy Colorado, VIN: 1GCHTCFE5B8114868

14. These actions violated her fiduciary duty, constituted self-dealing, and are actionable under fraud, embezzlement, elder abuse, and tax evasion statutes. She failed to:

\* Pay gift or capital gains tax

\* Pay property taxes (Exhibit I), leading to tax sale

15. Abrams later retained Ralph Powers to legitimize her misappropriation by filing for personal representative status to transfer the assets to the estate retroactively.

16. On June 4, 2024, at the hearing for Personal Representative, Judge Jason Deloach influenced the outcome by suggesting that Plaintiff allow Mr. Powers to handle the estate, citing his experience with 500 estates.

17. During that hearing, Abrams admitted to transferring property and vehicles to herself without legal authority. Judge Deloach failed to hold her accountable and did not recuse himself despite clear conflicts.

18. Despite Plaintiff's objections, Powers was appointed. Plaintiff filed an appeal to the Circuit Court, which was never granted a hearing. Instead, Powers filed a motion to strike the appeal with no certificate of service and no notice (Exhibit G).

19. Powers then used estate funds to pay property taxes incurred solely during Abrams' unlawful possession (Exhibit I) and informed heirs he intended to list the house for sale (Exhibit C).



20. The Trust filed an emergency motion to remove Powers (Exhibit D). No hearing was granted. Instead, Powers was made Special Administrator (Exhibit E).

21. The Trust attempted to resolve the matter privately by sending Notices to Cure to all parties (Exhibit F). All were ignored. Notices of Default followed with no response.

22. Evidence was tampered with in Orphans' Court: the Trust's Motion to Remove was reduced from 28 to 12 pages and missing key exhibits, including the DPOA contract (Exhibit H).

23. The Prince George's Land Records Department recorded the deed without a bill of sale or proper verification of legal authority (Exhibit B).

24. The Orphans' Court and Judge Deloach engaged in a pattern of due process violations, administrative misconduct, and collusion to protect Defendants.

## **V. CAUSES OF ACTION**

### **Count I: FRAUD & EMBEZZLEMENT**

Against Nicole Abrams under Md. Code § 8-301 and § 7-104; DPOA breach of fiduciary duty and conversion of estate property.

### **Count II: RICO VIOLATIONS**

Against Abrams, Powers, and Deloach for coordinated activities in estate conversion, document tampering, obstruction, and use of mail/fraudulent filings under 18 U.S.C. § 1961.

Count III: DUE PROCESS VIOLATIONS

Against Orphans' Court and Judge Deloach under 42 U.S.C. § 1983 and the 5th and 14th Amendments.

Count IV: SECURITIES FRAUD / UCC VIOLATIONS

Against all Defendants for improper handling and transfer of estate property without lawful title, violating UCC Article 9.

Count V: COLOR OF LAW / JUDICIAL MISCONDUCT

Against Judge Jason Deloach for directing outcomes and failing to recuse himself, violating 42 U.S.C. § 1983.

Count VI: TAX EVASION & ELDER ABUSE

Against Nicole Abrams under 26 U.S.C. § 7201 and Md. Code § 14-302.

**VI. PRAYER FOR RELIEF**

Plaintiff respectfully requests that this Court:

A. Issue an immediate injunction halting all actions in the Estate of Bennie Yeargin;

B. Restore all real and personal property to Sovereign Indigenous Holdings;

C. Award damages as follows:

\$2,000,000 against Orphans' Court

\$2,000,000 against Prince George's County Land Records

\$1,000,000 against Ralph Powers (and disbarment)

\$500,000 against Nicole Abrams

\$500,000 against Judge Jason Deloach

D. Order formal letters of apology from each Defendant;

E. Initiate criminal investigation of Defendants for conspiracy, collusion, and elder abuse;

F. Award any other relief the Court deems just and proper.

### VII. DECLARATION UNDER PENALTY OF PERJURY

I, Dwayne Anthony Yeargin, Trustee of Sovereign Indigenous Holdings, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

  
TRUSTEE/UCR 1-308

Executed on this 9 day of JUNE, 2025.

Dwayne Anthony Yeargin, Pro Se

Trustee, Sovereign Indigenous Holdings

P.O. Box 3431

Capitol Heights, MD 20791

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